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January 8, 2016

VIA ECF

Hon. Charles R. Breyer
United States District Court
450 Golden Gate Avenue
San Francisco CA 94102

Re: Letter in Support of Application by Marc Seltzer for Lead Counsel
In re Volkswagen "Clean Diesel" Marketing, Sales Practices, and
Products Liability Litigation (MDL No. 2672)

Dear Judge Breyer,

The undersigned is counsel for Plaintiffs in the matter of *Jorge Dell'Aquila et al. v. Volkswagen Group of America, Inc. et al.* (CACD 8:15-CV-01525-DOC). On behalf of my clients and my firm, please consider this letter in support of the applications of Marc M. Seltzer of Susman Godfrey LLP and Mark P. Robison Jr. of Robinson Calcagnie Robinson Shapiro David, Inc. as Plaintiffs' Lead or Co-Lead Counsel, or, in the alternative, as members of the Plaintiffs' Steering Committee.

These attorneys and their respective firms have the experience, depth and the resources to ably serve as lead counsel in this matter. Messrs. Seltzer and Robinson were appointed co-lead counsel in *In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation*, before Hon. James V. Selna, in the Central District, where after three years of litigation, they reached a historic class settlement with the class receiving net benefits valued at approximately \$1.4 billion.

Marc M. Seltzer has practiced law for more than forty years, litigating complex cases in state and federal courts throughout the United States, and is one of the most recognized and respected advocates in the country for large complex multi-district class actions. His personal reputation for integrity and fair play precedes him. Susman Godfrey LLP has long been at the forefront of consumer causes as lead and co-lead counsel in many of the nation's largest consumer and antitrust class action cases.

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Mark P. Robinson, Jr. is founding partner of Robinson Calcagnie Robinson in Newport Beach, California. His experience in auto product and toxic tort cases is unsurpassed, having achieved many of the largest verdicts in history. *Grimshaw v. Ford* (Ford Pinto fire case) \$128 million; *Anderson v. GM* \$4.9 billion (jury verdict); *Barnett v. Merck* (Vioxx) \$51 million (jury verdict); *County of Los Angeles v. R.J. Reynolds, et al.* \$3.3 billion settlement. The Robinson firm has been a trusted and reliable advocate for justice, achieving stellar results for thousands of consumers since 1979. Led by its dedicated leader, Mark P. Robinson, it is a strong choice for lead counsel.

I have known both of these lawyers for many years. The class would be well served by their appointment.

Very truly yours,

DONAHOO & ASSOCIATES, PC



Richard E. Donahoo

RED:ku

cc: Marc M. Seltzer (via email only)
Mark P. Robinson (via email only)